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EXHIBIT A

CALLAHAN & BLAINE, APLC

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Jonathan W. Hornberger (Bar No. 311144)

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Santa Ana, California 92707

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jhornberger@callahan-law.com

Attorneys for Plaintiff PATRICK GALLAGHER

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

PATRICK GALLAGHER,

| CASE NO. 23-cv-03579-SI

[FRCP 26]

Trial Date:

Plaintiff,

v.

DUFFY,

CITY AND COUNTY OF SAN FRANCISCO, BERNARD CURRAN, RODRIGO SANTOS, WILLIAM HUGHEN, KEVIN BIRMINGHAM, NATALIA KWAITKOWSKA, AND JOE

Defendants.

PLAINTIFF'S INITIAL DISCLOSURES

None Set

Pursuant to Federal Rule of Civil Procedure 26(a)(1), Plaintiff PATRICK GALLAGHER ("Plaintiff") provides the following initial disclosures:

WITNESSES:

The following is a list of each individual known to Plaintiff as of this date and presently believed by Plaintiff to possess discoverable information relevant to disputed facts alleged in the pleadings.

By making this Initial Disclosure, Plaintiff does not waive the right to object or otherwise challenge the admissibility of any testimony proffered by any individual listed. Plaintiff also reserves the right to supplement and/or amend this Initial Disclosure as discovery continues and/or Plaintiff prepares for trial.

No.	Witness	Subject	Contact
•	Plaintiff PATRICK GALLAGHER	All the allegations	Counsel of record
		and claims made in	
		the operative	
		complaint.	
		All work performed	
		on the subject	
		property and structure	
		located at 200 Naples	
		Street, San Francisco,	
		CA 94112, and all	
		applications for	
		permits, approvals,	
		variances, appeals, and any other	
		approvals requested	
		from the City and	
		County of San	
		Francisco.	
		All anaumbrances	
		All encumbrances, regulations,	
		enforcements, and	
		actions taken against	
		the subject property	
		by the City, City	
		departments,	
		agencies, boards, and	
		employees.	
		All information	
		related to Madison	
		Trust FBO Patrick	
		Gallaher and its	
		ownership of the	
		subject property.	
		All conversations,	
		correspondence, and	
		interactions with the	
		Federal Bureau of	
		Investigation and any	
		other local, state, or	
		federal law	
		enforcement agency	
		related to the City,	

	1			City departments,	
	2			agencies, boards,	
	3			employees, and the subject property.	
				All conversations,	
	4			correspondence, and	
	5			interactions with all of the named	
	6			defendants related to	
	7			the subject property and the allegations	
	8			and claims contained	
	9			in the operative complaint.	
	10	2	All	A 11 (1 11 (1	C/ DI : 4°CC2
	11	2.	All contractors, subcontractors, professionals, and others hired or	All the allegations and claims made in	C/o Plaintiff's counsel of record
TJ Z O	12		retained by Plaintiff to perform work for the construction,	the operative complaint.	
BLAINE ORPORATION , NINTH FLO RNIA 92707 241-4444 AW.COM	13		renovation, or remediation of the	-	
CORPC CORPC E, NIN DRNIA) 241-4			subject property.	All work performed on the subject	
N & LLAW E DRIV SALIFC : (714	14			property and structure	
ALLAHAN & BLAINE PROFESSIONAL LAW CORPORATION TTON CENTRE DRIVE, NINTH FLOOR SANTA ANA, CALIFORNIA 92707 TELEPHONE: (714) 241-4444 WWW.GALLAHAN-LAW.COM	15			located at 200 Naples Street, San Francisco,	
ALLL PROFES TON C ANTA TELEF	16			CA 94112, and all	
3 HUTI S,	17			applications for permits, approvals,	
	18			variances, appeals,	
	19			and any other approvals requested	
				from the City and	
	20			County of San Francisco.	
	21	2	D.C. I. ADEDMAND CURDAN		
	22	3.	Defendant BERNARD CURRAN	All the allegations and claims made in	Unknown at this time.
	23			the operative	
	24			complaint.	
	25			All work performed on the subject	
	26			property and structure	
	27			located at 200 Naples Street, San Francisco,	
				CA 94112, and all	
	28			applications for	

- 3 -

1			permits, approvals,	
2			variances, appeals,	
2			and any other	
3			approvals requested	
1			from the City and County of San	
4			Francisco.	
5			Tuneisco.	
6			All conversations,	
6			correspondence, and	
7			interactions with the	
o			Federal Bureau of	
8			Investigation and any other local, state, or	
9			federal law	
10			enforcement agency	
10			related to the City,	
11			City departments,	
80 12			agencies, boards,	
AN THOM TO THE STATE OF THE STA			employees, and the subject property.	
CORPORATION FE, NINTH FLOOR 1241-4444 LAW.COM			subject property.	
W CO NW CO SIVE, 114) 2.4N-LA			All conversations,	
			correspondence, and	
AHA SIONA SIONA ANA, PHONE			interactions with the Plaintiff and all of the	
ALLAHAN PROFESSIONALLY TTON CENTRE D SANTA MAN, CAL TELEPHONE: (7 WWW.CALLAH			named defendants	
O A F S			related to the subject	
± 17			property and the	
18			allegations and claims	
			contained in the	
19			operative complaint.	
20			His relationship with	
21			all of the named	
			defendants.	
22			All criminal charges	
23			brought against him	
24			related to his role with the City.	
25	4.	Defendant RODRIGO SANTOS	All the allegations	Unknown at this time
26			and claims made in the operative	
27			complaint.	
			<u> </u>	

- 4 -

1	All work performed	
2	on the subject	
	property and structure located at 200 Naples	
3	Street, San Francisco,	
4	CA 94112, and all	
5	applications for	
3	permits, approvals, variances, appeals,	
6	and any other	
7	approvals requested	
	from the City and	
8	County of San Francisco.	
9	Flancisco.	
10	All conversations,	
	correspondence, and	
11	interactions with the Federal Bureau of	
ш год 12	Investigation and any	
BLAINE ORPORATION ORPORATION ORNA 92707 2241-4444 AW.COM	other local, state, or	
BLA ORPOR ORPOR NINT 3 NIN 1 241-44 AW.CO	federal law	
ALLAHAN & BLAINE ROFESSIONAL LAW CORPORATION FON CENTRE DRIVE, ININTH FLOOR ANTA ANTA AND ANTA ANTA TELEPHONE: (714) 241-4444 WWW.CALLAHAN-LAW.COM 191 191 191 191 191 191 191 191 191 1	enforcement agency related to the City,	
ALLAHAN & PROFESSIONAL LAWGE TON CENTRE DRIVINANTA ANA, CALIFO WWW.CALLAHAN-1	City departments,	
ALLAHAN PROFESSIONAL TION CENTRE SANTA ANA, CE TELEPHONE: WWW.CALLA	agencies, boards,	
CALI A PROFE A PROFE SANTA TELE WWW	employees, and the	
17	subject property.	
18	All conversations,	
	correspondence, and	
19	interactions with the Plaintiff and all of the	
20	named defendants	
21	related to the subject	
21	property and the	
22	allegations and claims contained in the	
23	operative complaint.	
24	IT's collection of the socials	
	His relationship with all of the named	
25	defendants.	
26	A 11 1 - 1	
27	All criminal charges brought against him	
	related to his	
28	interactions and	

		dealings with the City, City departments, agencies, boards, and employees.	
5.	Defendant WILLIAM HUGHEN	_	Counsel of record
		All encumbrances, regulations, enforcements, and actions taken against the subject property by the City, City departments, agencies, boards, and employees.	
		All conversations, correspondence, and interactions with the Plaintiff and all of the named defendants related to the subject property and the allegations and claims contained in the operative complaint.	

	1			His relationship with	
	2			all of the named	
				defendants.	
	3			His duties and	
	4			responsibilities in his	
	5			role with the City.	
				The City's policies	
	6			and procedures	
	7			related to regulations,	
	8			approvals, enforcements, and	
				inspections of	
	9			property and	
	10			structures.	
	11	6.	Defendant KEVIN BIRMINGHAM	All the allegations and claims made in	Counsel of record
BLAINE CORPORATION E, NINTH FLOOR DRNIA 92707) 241-4444 -LAW.COM	12			the operative	
BLAINE ORPORATION S. NINTH FLO RNIA 92707 241-4444 AW.COM	13			complaint.	
BL CORPG E, NIP RNIA 1 241-				All work performed	
8 ≥ E E E E E E E E E E E E E E E E E E	14			on the subject	
HAA HONAL NA, C HONE	15			property and structure	
ALLAHAN ROFESSIONALLY TON CENTRE D ANTA ANA, CAL TELEPHONE: (7	16			located at 200 Naples Street, San Francisco,	
CALLA A PROFESS HUTTON CE SANTA A TELEP WWW.				CA 94112, and all	
6	17			applications for	
	18			permits, approvals, variances, appeals,	
	19			and any other	
	20			approvals requested	
				from the City and County of San	
	21			Francisco.	
	22			All encumbrances,	
	23			regulations,	
	24			enforcements, and	
				actions taken against the subject property	
	25			by the City, City	
	26			departments, agencies, boards, and	
	27			employees.	
	28				

- 7 -

	1			All conversations,	
	2			correspondence, and	
				interactions with the Plaintiff and all of the	
	3			named defendants	
	4			related to the subject	
	5			property and the	
	3			allegations and claims contained in the	
	6			operative complaint.	
	7			His relationship with	
	8			all of the named	
	9			defendants.	
	10			His duties and	
	11			responsibilities in his role with the City.	
O R					
BLAINE ORPORATION , NINTH FLOOR RNIA 92707 241-4444 AW.COM	12			The City's policies and procedures	
SLA RPOR NINT VIA 92 41-44 W.CO	13			related to regulations,	
& E	14			approvals,	
AN VALLA RE DE CAL VE: (7				enforcements, and inspections of	
ALLAHAN ROFESSIONAL LA TON CENTRE DI ANTA ANA, CAL TELEPHONE: (7	15			property and	
CALI A PROFE UTTON SANTA TELE	16			structures.	
O A LUH E	17	7.	Defendant NATALIA	All the allegations	Counsel of record
	18		KWAITKOWSKA	and claims made in	
	19			the operative complaint.	
	20			All work performed	
	21			on the subject	
	22			property and structure located at 200 Naples	
	23			Street, San Francisco, CA 94112, and all	
				applications for	
	24			permits, approvals, variances, appeals,	
	25			and any other	
	26			approvals requested from the City and	
	27			County of San Francisco.	
	28			Trancisco.	

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1			All encumbrances,	
2			regulations,	
			enforcements, and actions taken against	
3			the subject property	
4			by the City, City	
5			departments,	
5			agencies, boards, and	
6			employees.	
7			All conversations,	
			correspondence, and	
8			interactions with the	
9			Plaintiff and all of the named defendants	
10			related to the subject	
10			property and the	
11			allegations and claims	
12			contained in the operative complaint.	
			operative complaint.	
13			Her relationship with	
14 14			all of the named	
Ĭ K			defendants.	
15			Her duties and	
§ 16			responsibilities in her	
17			role with the City.	
			The City's policies	
18			and procedures	
19			related to regulations,	
			approvals,	
20			enforcements, and	
21			inspections of property and	
22			structures.	
23	8.	Defendant JOE DUFFY	All the allegations and claims made in	Counsel of record
24			the operative	
			complaint.	
25				
26			All work performed	
27			on the subject property and structure	
			located at 200 Naples	
28			Street, San Francisco,	

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1	CA 94112, and all	
2	applications for	
	permits, approvals,	
3	variances, appeals, and any other	
4	approvals requested	
	from the City and	
5	County of San	
6	Francisco.	
7	All encumbrances,	
′	regulations,	
8	enforcements, and	
9	actions taken against	
9	the subject property	
10	by the City, City departments,	
11	agencies, boards, and	
11	employees.	
12		
[∞] 13	All conversations,	
,	correspondence, and interactions with the	
14 E	Plaintiff and all of the	
15	named defendants	
	related to the subject	
§ 16	property and the	
17	allegations and claims	
	contained in the operative complaint.	
18	operative complaint.	
19	His relationship with	
20	all of the named	
20	defendants.	
21	His duties and	
22	responsibilities in his	
23	role with the City.	
	The City's policies	
24	and procedures	
25	related to regulations,	
	approvals, enforcements, and	
26	inspections of	
27	property and	
28	structures.	

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	1	9.	Matthew Greene	All the allegations	C/o Defendants'
	2			and claims made in	counsel of record
				the operative complaint.	
	3			All work performed	
	4			on the subject	
				property and structure	
	5			located at 200 Naples	
	6			Street, San Francisco, CA 94112, and all	
	7			applications for	
	/			permits, approvals,	
	8			variances, appeals,	
	9			and any other	
				approvals requested from the City and	
	10			County of San	
	11			Francisco.	
OR					
IN E TION FLOOR 07	12			All encumbrances,	
CORPORATION CORPORATION /E, NINTH FLO DRNIA 92707 /) 241-4444 -LAW.COM	13			regulations, enforcements, and	
CORF CORF /E, N ORNI, 241				actions taken against	
LAW DRIY ALIF	14			the subject property	
SSIONAL I CENTRE I A ANA, CA EPHONE:	15			by the City, City	
FESS N CEI TA AI LEPH	16			departments,	
A PROFE JTTON SANTA TELE WWV	10			agencies, boards, and employees.	
» He	17			employees.	
	18			All conversations,	
				correspondence, and interactions with the	
	19			Plaintiff and all of the	
	20			named defendants	
	21			related to the subject	
	<i>L</i> 1			property and the	
	22			allegations and claims contained in the	
	23			operative complaint.	
				T · · · ·	
	24			His relationship with	
	25			all of the named defendants.	
				defendants.	
	26			His duties and	
	27			responsibilities in his	
	28			role with the City.	
	20				

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1			The City's policies	
2			and procedures	
3			related to regulations, approvals,	
3			enforcements, and	
4			inspections of	
5			property and structures.	
			structures.	
6	10.	John Hinchion	All the allegations	C/o Defendants'
7			and claims made in the operative	counsel of record
8			complaint.	
9				
			All work performed on the subject	
10			property and structure	
11			located at 200 Naples	
12			Street, San Francisco, CA 94112, and all	
			applications for	
13			permits, approvals,	
14			variances, appeals, and any other	
15			approvals requested	
			from the City and	
16			County of San Francisco.	
17			Truncisco.	
18			All encumbrances,	
19			regulations, enforcements, and	
			actions taken against	
20			the subject property	
21			by the City, City departments,	
22			agencies, boards, and	
			employees.	
23			All conversations,	
24			correspondence, and	
25			interactions with the	
			Plaintiff and all of the named defendants	
26			related to the subject	
27			property and the	
28			allegations and claims contained in the	
		1		

	1			operative complaint.	
	2			His relationship with	
	3			all of the named defendants.	
	4				
	5			His duties and responsibilities in his	
	6			role with the City.	
	7			The City's policies	
				and procedures	
	8			related to regulations, approvals,	
	9			enforcements, and inspections of	
	10			property and	
	11			structures.	
	12	11.	Phil Saunders	All the allegations	C/o Defendants'
V.COM	13			and claims made in the operative	counsel of record
AN-LAV	14			complaint.	
WWW.CALLAHAN-LAW.COM	15			All work performed	
WW.C	16			on the subject	
_ ≥				property and structure located at 200 Naples	
	17			Street, San Francisco, CA 94112, and all	
	18			applications for	
	19			permits, approvals, variances, appeals,	
	20			and any other	
	21			approvals requested	
	22			from the City and County of San	
	23			Francisco.	
				All encumbrances,	
	24			regulations, enforcements, and	
	25			actions taken against	
	26			the subject property by the City, City	
	27			departments,	
	28			agencies, boards, and employees.	
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TELEPHONE: (714) 241-4444

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	1			All conversations,	
	2			correspondence, and interactions with the	
				Plaintiff and all of the	
	3			named defendants	
	4			related to the subject	
	_			property and the	
	5			allegations and claims contained in the	
	6			operative complaint.	
	7			operative complaints	
				His relationship with	
	8			all of the named	
	9			defendants.	
	10			His duties and	
	10			responsibilities in his	
	11			role with the City.	
	12			The City's policies	
+				and procedures	
	13			related to regulations,	
4 - N	14			approvals,	
LAH/				enforcements, and inspections of	
WWW.CALLAHAN-LAW.COM	15			property and	
, W .	16			structures.	
	17	10	D. (11 O)D: 1	A 11 /1 /1 /	C/ D C 1 / 2
		12.	Patrick O'Riordan	All the allegations and claims made in	C/o Defendants' counsel of record
	18			the operative	counsel of feedu
	19			complaint.	
,	20			All work performed	
,	21			on the subject	
				property and structure located at 200 Naples	
2	22			Street, San Francisco,	
2	23			CA 94112, and all	
4	24			applications for permits, approvals,	
4	25			variances, appeals, and any other	
2	26			approvals requested from the City and	
4	27			County of San	
,	28			Francisco.	

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NE	A PROFESSIONAL LAW CORPORATION	NOL	FLOOR	.07	, ,		12
CALLAHAN & BLAINE		A PROFESSIONAL LAW CORPORATION 3 HUTTON CENTRE DRIVE, NINTH FLOOR	SANTA ANA, CALIFORNIA 92707	TELEPHONE: (714) 241-4444	WWW.CALLAHAN-LAW.COM	11 12 13 14 15 16 17 18 19 20	
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AHA]		ENTRE			CALLA	15	
ALL	PROFES	TTON C	SANTA	TELEI	/////////////////////////////////////	16	
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		All encumbrances, regulations, enforcements, and actions taken against the subject property by the City, City departments, agencies, boards, and employees. All conversations, correspondence, and interactions with the Plaintiff and all of the named defendants related to the subject property and the allegations and claims contained in the operative complaint. His relationship with all of the named	
13.	Cory Teague	defendants. His duties and responsibilities in his role with the City. The City's policies and procedures related to regulations, approvals, enforcements, and inspections of property and structures. All the allegations and claims made in the operative complaint. All work performed on the subject property and structure located at 200 Naples Street, San Francisco,	C/o Defendants' counsel of record

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1	CA 94112, and all
2	applications for
2	permits, approvals, variances, appeals,
3	and any other
4	approvals requested
5	from the City and
	County of San Francisco.
6	A11
7	All encumbrances, regulations,
8	enforcements, and
9	actions taken against
	the subject property by the City, City
10	departments,
11	agencies, boards, and
BLAINE CORPORATION FE, NINTH FLOOR 1241-4444 LAW.COM	employees.
BLAINE ORPORATION ORPORATION OR NINTH FLO 241-4444 AW.COM	All conversations,
BL CORPG CORPG E, NII RNIA 1 241- LAW.	correspondence, and interactions with the
& ≥ ≦ ĭ ₹ z 14	Plaintiff and all of the
CALLAHAN A PROFESSIONAL LA JITON CENTRE DI SANTA MAN, CALL TELEPHONE: (7 WWW.CALLAHA	named defendants
PROFESS PROFESS TTON CE SANTA A TELEPH WWW.C	related to the subject property and the
	allegations and claims
± 17	contained in the
18	operative complaint.
19	His relationship with
20	all of the named
	defendants.
21	His duties and
22	responsibilities in his
23	role with the City.
24	The City's policies
	and procedures related to regulations,
25	approvals,
26	enforcements, and inspections of
27	property and
28	structures.
20	

	1	14.	Lifang Zhang	All the allegations	C/o Defendants'
	2			and claims made in	counsel of record
				the operative complaint.	
	3				
	4			All work performed	
	5			on the subject property and structure	
				located at 200 Naples	
	6			Street, San Francisco,	
	7			CA 94112, and all applications for	
	8			permits, approvals,	
				variances, appeals,	
	9			and any other	
	10			approvals requested from the City and	
	11			County of San	
R				Francisco.	
IN E TION FLOOR 07	12			A 11 1	
CORPORATION CORPORATION /E, NINTH FLO DRNIA 92707 /) 241-4444 -LAW.COM	13			All encumbrances, regulations,	
CORI VE, N ORNI 1) 241	1 1			enforcements, and	
LLAW EDRIY SALIF	14			actions taken against	
SSIONAL I CENTRE I A ANA, CA EPHONE:	15			the subject property	
PROFESS TTON CE SANTA A TELEPI WWW.	16			by the City, City departments,	
A PRC IUTTC SAL V				agencies, boards, and	
» - E H %	17			employees.	
	18			All conversations,	
	19			correspondence, and	
				interactions with the	
	20			Plaintiff and all of the named defendants	
	21			related to the subject	
	22			property and the	
				allegations and claims	
	23			contained in the operative complaint.	
	24			operative complaint.	
	25			Her relationship with	
				all of the named defendants.	
	26			detenuants.	
	27			Her duties and	
	28			responsibilities in her	
	20			role with the City.	

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		The City's policies and procedures related to regulations, approvals, enforcements, and inspections of property and structures.	
15.	Christine Gasparac	All the allegations and claims made in the operative complaint. All work performed on the subject property and structure located at 200 Naples Street, San Francisco, CA 94112, and all applications for permits, approvals, variances, appeals, and any other approvals requested from the City and County of San Francisco. All encumbrances, regulations, enforcements, and actions taken against the subject property by the City, City departments, agencies, boards, and employees. All conversations, correspondence, and interactions with the Plaintiff and all of the named defendants related to the subject property and the allegations and claims contained in the	C/o Defendants' counsel of record

	1			operative complaint.	
	2			Her relationship with	
	3			all of the named defendants.	
	4			defendants.	
				Her duties and	
	5			responsibilities in her role with the City.	
	6			Tole with the City.	
	7			The City's policies	
	8			and procedures related to regulations,	
				approvals,	
	9			enforcements, and	
1	0			inspections of	
1	1			property and structures.	
	2	16.	Kenneth Burke	All the allegations and claims made in	C/o Defendants' counsel of record
ا ا ا	3			the operative	counsel of fecolu
\(\frac{1}{2}\)	4			complaint.	
Ĭ.				All work performed	
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§ 1	6			property and structure	
1	7			located at 200 Naples Street, San Francisco,	
1	8			CA 94112, and all	
				applications for	
1	9			permits, approvals, variances, appeals,	
2	0.			and any other	
2	1			approvals requested	
				from the City and County of San	
2	2			Francisco.	
2	3				
2	4			All encumbrances, regulations,	
				enforcements, and	
	5			actions taken against	
2	6			the subject property by the City, City	
2	7			departments,	
				agencies, boards, and	
2	8			employees.	

- 19 -

	1			All conversations,	
,	2			correspondence, and interactions with the	
,	3			Plaintiff and all of the	
				named defendants	
4	4			related to the subject property and the	
	5			allegations and claims	
	6			contained in the	
				operative complaint.	
,	7			His relationship with	
	8			all of the named	
	9			defendants.	
				His duties and	
10	0			responsibilities in his	
1	1			role with the City.	
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, " - o	6			structures.	
ا م الله الله الله الله الله الله الله ا	7	17.	Brett Howard	All the allegations	C/o Defendants'
18	8			and claims made in	counsel of record
19				the operative complaint.	
				Complaint.	
20	0			All work performed	
2	1			on the subject property and structure	
22	2			located at 200 Naples	
2:				Street, San Francisco, CA 94112, and all	
24				applications for	
2:				permits, approvals, variances, appeals,	
				and any other approvals requested	
20	6			from the City and	
2	7			County of San	
28	8			Francisco.	

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CALLAHAN & BLAINE	A PROFESSIONAL LAW CORPORATION	3 HUTTON CENTRE DRIVE, NINTH FLOOR	SANTA ANA, CALIFORNIA 92707	TELEPHONE: (714) 241-4444	WWW.CALLAHAN-LAW.COM	13
N &	L LAW C	E DRIVE	SALIFOR	: (714)	AHAN-L	14
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		All encumbrances, regulations, enforcements, and actions taken against the subject property by the City, City departments, agencies, boards, and employees.	
		All conversations, correspondence, and interactions with the Plaintiff and all of the named defendants related to the subject property and the allegations and claims contained in the operative complaint.	
		His relationship with all of the named defendants.	
		His duties and responsibilities in his role with the City.	
		The City's policies and procedures related to regulations, approvals, enforcements, and inspections of property and structures.	
18.	Jeff Buckley	All the allegations and claims made in the operative complaint.	C/o Defendants' counsel of record
		All work performed on the subject property and structure located at 200 Naples Street, San Francisco,	
	21		

- 21 -

1		CA 94112, and all	
2		applications for	
		permits, approvals, variances, appeals,	
3		and any other	
4		approvals requested	
		from the City and	
5		County of San	
6		Francisco.	
7		All encumbrances,	
		regulations,	
8		enforcements, and	
9		actions taken against the subject property	•
		by the City, City	
10		departments,	
11		agencies, boards, and	i l
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IN ATIC		All conversations,	
BLA ORPOR NINT NIA 95 W.CO		correspondence, and	
& ≥ ≥ ± ± 14		interactions with the	
AN WALLY RED CALLY NE: (7		Plaintiff and all of the named defendants	e
ALLAHAN ROFESSIONALLI TON CENTRE D TANTA ANA, CALL TELEPHONE: (7) WWW.CALLAH		related to the subject	
ALI ANDA WWW		property and the	
17		allegations and clain	1S
		contained in the operative complaint.	
18		operative complaint.	
19		His relationship with	ı
20		all of the named	
		defendants.	
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22		responsibilities in hi	S
23		role with the City.	
		The City's policies	
24		and procedures	
25		related to regulations	3,
		approvals, enforcements, and	
26		inspections of	
27		property and	
28		structures.	
20	 		

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	1	19.	Matt Czajkowski	All the allegations	C/o Defendants'
	2			and claims made in the operative	counsel of record
				complaint.	
	3				
	4			All work performed	
	5			on the subject	
				property and structure located at 200 Naples	
	6			Street, San Francisco,	
	7			CA 94112, and all	
	8			applications for	
	0			permits, approvals, variances, appeals,	
	9			and any other	
1	0			approvals requested	
				from the City and County of San	
1	1			Francisco.	
N & DLAINE LAW CORPORATION DRIVE, INITH FLOOR (714) 241-4444 HAN-LAW, COM	2				
L AINE PORATION INTH FLC A 92707 1-4444 CCOM	3			All encumbrances,	
DL CORP E, NII RNIA 241- LAW.				regulations, enforcements, and	
	4			actions taken against	
PROFESSIONAL I TON CENTRE E SANTA ANA, CA TELEPHONE: WWW.CALLAH	5			the subject property	
	6			by the City, City	
	6			departments, agencies, boards, and	
	7			employees.	
1	8				
				All conversations,	
1	9			correspondence, and interactions with the	
2	0			Plaintiff and all of the	
2	1			named defendants	
				related to the subject property and the	
2	2			allegations and claims	
2	3			contained in the	
2	4			operative complaint.	
				His relationship with	
2	5			all of the named	
2	6			defendants.	
2	7			His duties and	
				responsibilities in his	
2	8			role with the City.	

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		The City's policies and procedures related to regulations, approvals, enforcements, and inspections of property and structures.	
20.	Kelly Wong	All the allegations and claims made in the operative complaint. All work performed on the subject property and structure located at 200 Naples Street, San Francisco, CA 94112, and all applications for permits, approvals, variances, appeals, and any other approvals requested from the City and County of San Francisco. All encumbrances, regulations, enforcements, and actions taken against the subject property by the City, City departments, agencies, boards, and employees. All conversations, correspondence, and interactions with the Plaintiff and all of the named defendants	C/o Defendants' counsel of record
		related to the subject property and the allegations and claims contained in the	

	1 2 3			operative complaint. Her relationship with all of the named defendants.	
	4 5 6			Her duties and responsibilities in her role with the City. The City's policies	
	7 8 9 0			and procedures related to regulations, approvals, enforcements, and inspections of property and structures.	
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	2 3 4 5 6 7 8 9 0 1 2 3 4 5 6	21.	Neville Pereira	All the allegations and claims made in the operative complaint. All work performed on the subject property and structure located at 200 Naples Street, San Francisco, CA 94112, and all applications for permits, approvals, variances, appeals, and any other approvals requested from the City and County of San Francisco. All encumbrances, regulations, enforcements, and actions taken against the subject property by the City, City departments, agencies, boards, and	C/o Defendants' counsel of record
2	8			employees.	

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1			All conversations,	
2			correspondence, and	
2			interactions with the	
3			Plaintiff and all of the	
4			named defendants	
4			related to the subject	
5			property and the allegations and claims	
			contained in the	
6			operative complaint.	
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			His relationship with	
8			all of the named	
9			defendants.	
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10			His duties and responsibilities in his	
1.1			role with the City.	
11			Tole with the City.	
ш <u>г</u> о 12			The City's policies	
ORATION NTH FLC N 92707 13 COM			and procedures	
BLA ORPOR NIA 92 NIN 1 NIA 92 AW. CO			related to regulations,	
8 % CC %			approvals,	
4 - 1 - 4			enforcements, and	
LAHAN ESSIONAL L CENTRE D A ANA, CAL EPHONE: (W.CALLAH			inspections of	
			property and structures.	
A ATT AN			structures.	
17	22.	Hai Pham	All the allegations	C/o Defendants'
18			and claims made in	counsel of record
10			the operative	
19			complaint.	
20			All work performed	
21			on the subject	
21			property and structure	
22			located at 200 Naples	
23			Street, San Francisco, CA 94112, and all	
23			applications for	
24			permits, approvals,	
25			variances, appeals,	
25			and any other	
26			approvals requested	
			from the City and	
27			County of San Francisco.	
28			Trancisco.	

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	1			All encumbrances,	
	2			regulations,	
				enforcements, and actions taken against	
	3			the subject property	
	4			by the City, City	
	_			departments,	
	5			agencies, boards, and	
	6			employees.	
	7			All conversations,	
	'			correspondence, and	
	8			interactions with the	
	9			Plaintiff and all of the	
				named defendants related to the subject	
1	0			property and the	
1	1			allegations and claims	
				contained in the	
+	2			operative complaint.	
WWW.CALLAHAN-LAW.COM	3			His relationship with	
*	4			all of the named	
F A I	4			defendants.	
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.> 1	6			His duties and responsibilities in his	
	U			role with the City.	
1	7			Total with the city.	
1	8			The City's policies	
				and procedures	
1	9			related to regulations, approvals,	
2	20			enforcements, and	
_	. 1			inspections of	
2	21			property and	
2	22			structures.	
2	23	23.	Susan Nawberry	All the allegations	C/o Defendants'
2	4			and claims made in the operative	counsel of record
				complaint.	
2	25			- Compression	
2	26			All work performed	
				on the subject	
2	27			property and structure located at 200 Naples	
2	8			Street, San Francisco,	
	ll.		<u> </u>	, , , , , , , , , , , , , , , , , , , ,	i .

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1		CA 94112,	
2		application	
		permits, ap variances, a	
3		and any oth	
4		approvals r	equested
5		from the Ci	
3		County of S Francisco.	san
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8		regulations, enforcement	
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9		the subject	property
10		by the City.	
		department agencies, be	
11		employees.	
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ALLAHAN PROFESSIONAL LA TTON CENTRE DI SANTA AND, CALI TELEPHONE: (7 WWW.CALLAHA		related to the property an	
$O \neq P_{\infty}$		allegations	and claims
± 17		contained in	
18		operative co	ompiaint.
19		Her relation	nship with
		all of the na	
20		defendants.	
21		Her duties a	and
22		responsibili	
23		role with th	e City.
		The City's	policies
24		and proced	
25		related to reapprovals,	egulations,
26		approvais, enforcemen	its, and
		inspections	of
27		property an	d
28		structures.	
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	1	24.	Brent Howard	All the allegations	C/o Defendants'
	2			and claims made in	counsel of record
				the operative complaint.	
	3			complaint.	
	4			All work performed	
	5			on the subject	
				property and structure located at 200 Naples	
	6			Street, San Francisco,	
	7			CA 94112, and all	
	8			applications for permits, approvals,	
				variances, appeals,	
	9			and any other	
	10			approvals requested	
				from the City and County of San	
ov.	11			Francisco.	
CORPORATION CORPORATION /E, NINTH FLOOR ORNIA 92707), 241-4444 -LAW.COM	12				
ORATION ORATION NTH FLC 1 92707 -4444	13			All encumbrances,	
CORP CORP E, NI ORNIA) 241 LAW.				regulations, enforcements, and	
AN LIFE	14			actions taken against	
SSIONAL I CENTRE I A ANA, CA EPHONE:	15			the subject property	
-	16			by the City, City departments,	
A PROF A PROF 3 HUTTON SANT TEL				agencies, boards, and	
т Ю	17			employees.	
	18			All conversations	
	19			All conversations, correspondence, and	
				interactions with the	
	20			Plaintiff and all of the	
	21			named defendants related to the subject	
	22			property and the	
				allegations and claims	
	23			contained in the	
	24			operative complaint.	
				His relationship with	
	25			all of the named	
	26			defendants.	
	27			His duties and	
	28			responsibilities in his	
	40			role with the City.	

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		The City's policies and procedures related to regulations, approvals, enforcements, and inspections of property and structures.	
25.	Ernest Jones	All the allegations and claims made in the operative. All work performed on the subject property and structure located at 200 Naples Street, San Francisco, CA 94112, and all applications for permits, approvals, variances, appeals, and any other approvals requested from the City and County of San Francisco. All encumbrances, regulations, enforcements, and actions taken against the subject property by the City, City departments, agencies, boards, and employees. All conversations, correspondence, and interactions with the Plaintiff and all of the named defendants related to the subject property and the allegations and claims contained in the operative complaint.	Unknown at this time.

	7	DOR			
CALLAHAN & BLAINE	A PROFESSIONAL LAW CORPORATION	3 HUTTON CENTRE DRIVE, NINTH FLOOR	SANTA ANA, CALIFORNIA 92707	TELEPHONE: (714) 241-4444	WWW.CALLAHAN-LAW.COM

	,	1	
		A meeting that took place in or around between Plaintiff and members of the City's Department of Building Inspection.	
26.	Kathy MacKenzie	All the allegations and claims made in the operative complaint. All encumbrances, regulations, enforcements, and actions taken against the subject property by the City, City departments, agencies, boards, and employees. All conversations, correspondence, and interactions with the Plaintiff and all of the named defendants related to the subject property and the allegations and claims contained in the operative complaint. All escrow and attempted sales of the subject property.	1180 Iron Point Road, #190 1 Folsom, CA 95630 (916) 984-1380
27.	Department of Building Inspection Custodian of Records	Authentication of records related to the subject property	C/o Defendants' counsel of record
28.	Planning Department Custodian of Records	Authentication of records related to the subject property.	C/o Defendants' counsel of record
29.	Department of Public Works Custodian of Records	Authentication of records related to the subject property.	C/o Defendants' counsel of record

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30.	San Francisco Board of Supervisors Custodian of Records	Authentication of records related to the subject property.	C/o Defendants' counsel of record
31.	All witnesses identified in Defendants' Initial Disclosures and identified during discovery	TBD	TBD

DOCUMENTS:

Plaintiff presently believes that the following documents, electronically stored information, and tangible things are in his possession, custody, or control and may support his defenses.

Plaintiff produces with his Initial Disclosures a list of unprivileged categories of documents of which Plaintiff is currently aware that are reasonably available and tend to support the positions that Plaintiff has taken or are reasonably likely to take in this case. By including documents in this disclosure, Plaintiff in no way intends to waive any objections or privilege concerning the production of these documents. Plaintiff includes in his Initial Disclosure a list of all unprivileged documents that are reasonably available, or that on information and belief exist, that tend to support the positions that Defendants have taken or is reasonably likely to take in this case.

Specifically, Plaintiff currently is aware of the following documents:

- 1. Signed Certificate of Completion for the subject property.
- 2. Documents related to ownership of the subject property including the grant deed.
- 3. Plans and designs related to the construction and/or renovation of the subject property.
- 4. Documents related to permits, permit applications, job cards, variances, and variance applications related to the subject property.
- 5. Documents related to notices of violations, abatement orders, code enforcement liens, and other enforcement orders concerning the subject property.
- 6. Documents related to complaints concerning the subject property.

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7.	Correspondence	and communication	s regarding No	os. 1-6 above.
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8. All documents identified in Defendants' initial disclosures and identified during discovery.

DAMAGES:

Plaintiff seeks the following damages at this time:

- 1. General damages (also known as non-economic damages), according to proof;
- 2. Special damages (also known as economic damages), according to proof;
- 3. Compensatory damages, according to proof;
- 4. Treble damages pursuant to Civil Code § 3345;
- 5. An order enjoining Defendants from violating Plaintiff's constitutional rights;
- 6. Injunctive relief;
- 7. Punitive damages, according to proof;
- 8. Prejudgment interest and pretrial interest, according to proof;
- 9. Attorneys' fees and costs, according to proof;
- 10. Damages for Plaintiff's other losses, according to proof;
- 11. All statutorily allowed damages; and
- 12. Such other and further relief as deemed proper by the Court.

The damages amounts are not yet determined and will not be final until this action is concluded.

INSURANCE AGREEMENTS:

None.

The City is self-insured under, among other things, California Government Code section 990, subdivision (a). The individual defendants' rights to defense and indemnity by the City are as under California Government Code section 825. (See also Cal. Gov't Code, § 990, subd (b)).

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CERTIFICATION

To the best of my knowledge, information and belief, formed after an inquiry that is reasonable under the circumstances, Plaintiff's Initial Disclosure is complete and correct as of this date.

Dated: February 23, 2024

CALLAHAN & BLAINE, APLC

By:

Javier H. van Oordt Jonathan W. Hornberger Attorneys for Plaintiff PATRICK GALLAGHER

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PROOF OF SERVICE

[FRCP 5(B)]

STATE OF CALIFORNIA, COUNTY OF ORANGE

I am employed in the County of Orange, State of California. I am over the age of 18 years and am not a party to the within action; my business address is 3 Hutton Centre Drive, Ninth Floor, Santa Ana, California 92707.

On February 23, 2024, I served the following document(s) described as **PLAINTIFF'S INITIAL DISCLOSURES [FRCP 26]** on the interested parties in this action as follows:

Tom Lakritz
Office of City Attorney David Chiu
City Hall, Room 234
1 Dr. Carlton B. Goodlett Pl.
San Francisco, CA 94102
Email: Tom.Lakritz@sfcityatty.org
cc: Anita Murdock

Defendant, CITY AND COUNTY OF SAN FRANCISCO; WILLIAM HUGHEN; KEVIN BIRMINGHAM; NATALIA KWAITKOWSKA; MAURICIO HERNANDEZ; and JOE DUFFY

Anita.Murdock@sfcityatty.org
Kathleen Hill Kathleen.Hill@sfcityatty.org

BY EMAIL: My electronic service address is erichards@callahan-law.com. Based on a written agreement of the parties pursuant to Fed. Rules Civ. Proc., Rule 5(b)(2)(E) to accept service by electronic means, I sent such document(s) to the email address(es) listed above or on the attached Service List. Such document(s) was scanned and emailed to such recipient(s) and email confirmation(s) will be maintained with the original document in this office indicating the recipients' email address(es) and time of receipt.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct, and that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on February 23, 2024, at Santa Ana, California.

SlongRichard

Elena Richards